



*State of New Jersey*  
OFFICE OF THE ATTORNEY GENERAL  
DEPARTMENT OF LAW AND PUBLIC SAFETY  
DIVISION OF LAW  
25 MARKET STREET  
PO Box 116  
TRENTON, NJ 08625-0116

PHILIP D. MURPHY  
*Governor*

SHEILA Y. OLIVER  
*Lt. Governor*

MATTHEW J. PLATKIN  
*Attorney General*

MICHAEL T.G. LONG  
*Director*

October 28, 2022

**VIA ECF**

Hon. Renee Marie Bumb, U.S.D.J.  
U.S. District Court, District of New Jersey Camden  
Mitchell H. Cohen Building and U.S. Courthouse  
4<sup>th</sup> and Cooper Streets  
Camden, NJ 08101

**Re: Greco v. Laielli, et al; Docket No. 1:22-cv-04058-  
RMB/EAP  
Motion to Dismiss**

Dear Judge Bumb:

This office represents the Defendant, New Jersey Office of Homeland Security and Preparedness ("NJOHSP"), in the above-referenced matter. Please accept this letter in lieu of more formal brief in reply to Plaintiff's Opposition to the Defendant's Motion to Dismiss.

It is clear the Plaintiff's Complaint should be dismissed on the basis of sovereign immunity, because the Defendant is not a person amenable to suit under §1983, because the Plaintiff has filed the defamation suit outside the applicable statute of limitations, and finally because Plaintiff has failed to comply with the notice provision of New Jersey Tort Claims Act.



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Plaintiff's opposition does not address these issues, and instead reiterates his claims that the individual defendants falsified information and/or defamed him. He does not address the statute of limitations issue with his defamation claim nor does he address his failure to comply with the notice provision Tort Claims Act.

It is therefore, respectfully requested that this court grant Movant's Motion to Dismiss, dismissing all claims, including any cross-claims, against it with prejudice.

Respectfully submitted,

MATTHEW J. PLATKIN  
ATTORNEY GENERAL OF NEW JERSEY

By: /s/Christine A. Barris  
Christine A. Barris  
Deputy Attorney General

C: All counsel of record (via ECF only)  
David Greco (via ECF, regular and certified mail)